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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 *****

11 MARIO ESCOBEDO-GONZALEZ,)

Case No.: 2:15cv01687 JCM PAL

12 Plaintiff,)

13 vs.)

14 JOHN KERRY, in his Official Capacity only as
15 Secretary of the Department of State, U.S.
16 DEPARTMENT OF STATE, the UNITED
17 STATES OF AMERICA and JOHN DOES
18 1 through XX, inclusive,)

19 Defendants.)

20 STIPULATION AND ORDER EXTENDING THE TIME FOR THE
21 PARTIES TO FILE THE JOINT PRE-TRIAL ORDER
(Second Request)

22 THE PARTIES HEREBY STIPULATE, through their attorneys of record, to the
23 following:

24 1. On April 20, 2017, the Court entered its Decision on Plaintiff's Motion
25 for Summary Judgment. The current deadline for the parties to submit the Joint
26 Pre-Trial Order is May 20, 2017.
27
28

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1 2. The parties Stipulated on May 18, 2017 to extend the time for the
2 filing of the Joint Pre-Trial Order because the parties anticipate that they may be
3 able to resolve this matter outside of litigation through action on the
4 administrative level. Specifically, Plaintiff's receipt of documentation may lead to
5 administrative action that may render this case moot.

6
7 3. Plaintiff's counsel was informed on **July 18, 2017** that the Texas
8 Department of Vital Statistics will be sending out Plaintiff's birth certificate.

9 4. Accordingly, the parties request that they have an additional 60
10 days, until September 20, 2017 to file their Joint Pre-Trial Order.

11 5. This is the second request for extension of time sought for this
12 specific purpose. The extension is sought in good faith and not for purposes of
13 delay.

14 Respectfully submitted this 20th day of July, 2017.

15
16 GARCIA-MENDOZA & SNAVELY

OFFICE OF IMMIGRATION LITIGATION

17
18 s/ Eva Garcia-Mendoza
19 EVA GARCIA-MENDOZA, ESQ.
20 NEVADA BAR NO.: 1779
21 ATTORNEY FOR PLAINTIFF

22 s/ Hans H. Chen*
23 HANS H. CHEN, Senior Litigation Counsel
24 Post Office Box 868 Ben Franklin
25 Washington, D.C. 20044
26 ATTORNEY FOR DEFENDANTS
27 (Authorized by email on 7/20/17)

28
ORDER

IT IS SO ORDERED this 7th day of August, 2017.


UNITED STATES DISTRICT JUDGE/
UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July _____, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all ECF participants. Furthermore, I mailed a copy of the foregoing by first class mail, or have dispatched it to a third party commercial carrier for delivery within three calendar days to all non-ECF participants. Thus, I have served the following:

Hans H. Chen (via CM/ECF)
Senior Litigation Counsel
E-mail: Hans.H.Chen@usdoj.gov
Attorney for Defendants

An employee of Garcia-Mendoza & Snavely